



Consulting Engineers and Scientists

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18 April 2006

Mr. David Bacharowski
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Notification of Planned Soil Excavation and Inspection at Area 6
(Former Buildings B, D, and J Area)
13379 Louvre Street and 11034 and 11060 Sutter Avenue
Pacoima, California
(EKL A20034.09)

Dear Mr. Bacharowski:

Erler & Kalinowski, Inc. ("EKL") submits this notification letter describing planned soil excavation and inspection of soil beneath pavement and concrete for the property at 13379 Louvre Street and 11034 and 11060 Sutter Avenue in Pacoima, California ("Site"). These activities are a continuation of the work planned in the *Soil Excavation Work Plan, 13500 Paxton Street, Pacoima, California*, dated 18 February 2004, as amended 17 September 2004 and approved by the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") in letters dated 25 June 2004 and 17 November 2005 (collectively the "Work Plan") and which has been subject to public comment. The Site is designated as Area 6 in the Work Plan.

Previous investigations of soil at the suspected location of a former clarifier in Building B detected concentrations of chromium and hexavalent chromium above remediation goals in several soil samples. Also, in one shallow soil sample, lead was detected above its remediation goal (i.e., BC-7 at 2 feet below ground surface ["bgs"]). No other chemicals of concern were detected above goals.

Soil excavation work in the Building B area has been planned to occur following its demolition. Based on discussions with the current property owner, it is our understanding that demolition of Buildings B, D, and J at the Site is anticipated to be completed by late May or early June 2006, at which time removal of concrete slabs, inspection of soil, and soil excavation activities can begin. The RWQCB will be notified approximately one week in advance of soil inspection and excavation activities. A notice will be prepared for distribution to the public one week before start of excavation.

Figure 1 shows the layout of Buildings B, D, and J in Area 6 and the approximate location of a former clarifier in Building B. Analytical data for historic soil samples shown on Figure 1 were presented in EKL's *Soil Excavation Completion Report*, dated 17 June 2005.

Additional Investigation

Soil: Additional soil sampling will be performed prior to soil excavation in Building B to further characterize the lateral and vertical extent of total and hexavalent chromium and lead concentrations in soil. Soil samples will be collected from approximately eight borings completed to just above the groundwater table. Soil samples will be obtained using a hollow-stem auger rig and collected at approximately five-foot depth intervals in select borings for logging purposes. For borings advanced adjacent to a historic boring location, samples will be collected at approximately 5-foot intervals to the groundwater table with the first sample collected approximately 5 feet below the maximum sample depth of the historic boring location. Soil samples collected will be screened for the presence of VOCs using a field organic vapor meter ("OVM"). Soil samples submitted for laboratory analysis will be analyzed for total and leachable (i.e., waste extraction test procedure using deionized water ["WET-DI"]) chromium, lead, and hexavalent chromium using EPA Methods 6020 and 7199. Planned soil sampling locations are presented on Figure 2.

Groundwater: During the January 2006 groundwater monitoring event, elevated concentrations of hexavalent chromium were detected in wells MW-6 and PMW-13 which also had higher water levels than in the past. To further assess hexavalent chromium concentrations in groundwater beneath the Site, grab groundwater samples will be collected from four borings and analyzed for hexavalent chromium using EPA Method 218.6 (see Figure 2). Three of the proposed borings advanced for grab groundwater sampling are located near the former Building B clarifier and are included in the above scope of work for collection of soil samples for analysis. One grab groundwater sampling location will be advanced upgradient of groundwater monitoring well MW-6.

Soil Inspection and Excavation of Contaminated Soil

Concrete slabs, pavement, and subsurface structures will be removed and handled pursuant to procedures in the Work Plan. Concrete that exhibits an indication of significant contamination will be segregated from concrete that is believed to be uncontaminated.

After removal of concrete slabs, pavement, and subsurface structures in Area 6, representatives of the RWQCB, if present, will inspect the ground surface and consult regarding the need for additional sampling. If sampling results exceed remediation goals, additional soil remediation will be performed consistent with the previously approved Work Plan.

The metals-impacted soils from the Building B clarifier area will be excavated in accordance with the methods and procedures described in the Work Plan. The metals-impacted soils will be removed using standard excavation techniques; excavation of

deeper soil may be completed using a large-diameter solid flight auger rig. Currently, the anticipated maximum depth of excavation is 40 feet bgs.

Excavated soil and debris will be temporarily stockpiled on-site and covered with plastic sheeting or directly loaded into trucks. The excavated materials will be disposed at an appropriately permitted off-site disposal facility located out of the local area.

After completion of soil excavation in an area around the suspected former clarifier, confirmation soil samples will be collected and analyzed for total and leachable (i.e., WET-DI) chromium and hexavalent chromium. A shallow soil sample north of the former clarifier exceeded the site remediation goal for lead, thus, confirmation samples collected in this area will also be analyzed for total and leachable (i.e., WET-DI) lead using EPA Method 6020. Post-excavation confirmation soil samples will be collected at a spacing of approximately 20 feet in the bottom and along the sidewalls of the excavated area (i.e., one sample per approximately 400 square feet of area) to the extent appropriate. For deep auger excavations, the results of soil samples from pre-excavation soil borings will be used to determine the extent of excavation. When soil sampling results confirm that remediation goals have been achieved, the excavated area will be backfilled. Backfill will consist of one or more of the following: (1) import fill that has been tested consistent with relevant regulatory guidance or (2) on-site soil that has been tested to demonstrate that chemicals of concern are not present above goals, and/or (3) cement slurry (i.e., for deep auger excavations only).

The work areas will be secured to prevent unauthorized access during excavation activities. Consistent with past soil excavation remediation activities at the Site, dust controls will be implemented during excavation-related activities in accordance with the South Coast Air Quality Management District Rule 403 (e.g., application of water). Dust monitoring equipment will be located at the perimeter of the work area (upwind and downwind of the days' planned excavation or loading activities) during active excavation and loading of contaminated soil or debris. The real-time data obtained will be used by on-site field personnel to make adjustments as needed to excavation and loading activities to minimize the potential for off-site migration of visible dust.

Weekly updates will be provided to the RWQCB during the work and a report, including laboratory analytical test results, will be submitted for RWQCB approval to document the completion of work in Area 6.

Based on discussions with the current property owner regarding the schedule for completion of building demolition, we anticipate conducting the additional investigation and subslab soil inspection in Area 6 beginning approximately 30 days after start of building demolition. Thank you for your attention to this matter.

Letter to David Bacharowski
California Regional Water Quality Control Board, Los Angeles Region
18 April 2006
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Very truly yours,

ERLER & KALINOWSKI, INC.

A handwritten signature in black ink, appearing to read 'Steven G. Miller'.

Steven G. Miller, P.E.
Project Manager

cc: Wendy Phillips, RWQCB
Mohammad Zaidi, RWQCB
Linda Biagioni, Black & Decker
Lorraine Sedlak, Black & Decker
Eileen Nottoli, Allen Matkins

Attachment

Figure 1 – Area 6 – Buildings B, D, and J Area, Historic Sampling Locations
Figure 2 – Proposed Soil and Grab Groundwater Sampling Locations